

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AURELIO MONTANO,

Plaintiff,

v.

Case Number 1:21-cv-06867

WEXFORD HEALTH SERVICES, INC.,
CORY WINGERTER, TREVOR
GREGERSON, LESLIE WILKING, M.
HENZE, M.D.,

Defendants.

UNOPPOSED MOTION
FOR ENTRY OF AN AGREED CONFIDENTIALITY ORDER

NOW COMES the Defendant, WEXFORD HEALTH SOURCES, INC., by and through its attorneys, Matthew H. Weller and Bryan R. Findley, of CASSIDAY SCHADE LLP, and for its Unopposed Motion for Entry of an Agreed Confidentiality Order, state as follows:

1. Plaintiff, an inmate at of the IDOC, brings this action pursuant to 42 U.S.C. § 1983 for alleged violations of his constitutional rights.
2. Plaintiff has issued written discovery requests to Wexford requesting certain confidential, proprietary business information or information discussing operations aspects of the prison.
3. Defendants contend that some of the requested information is subject to protection under Federal Rule of Civil Procedure 26(c)(1)(G).
4. Defendants respectfully requests that a Protective Order be entered over the production of documents in this matter.
5. A copy of the proposed order is being provided to the Court's proposed order inbox concurrent with this Motion's filing. The Parties have met and conferred and agreed to

two changes to the model order. One in Section 2 and the other in Section 5, both related to trying to minimize the actual Plaintiff-inmate, not his attorneys, possessing copies of documents not intended for inmates' eyes due to the safety and security concerns of the facility, its workforce, and the inmate population. With the Court's permission, the Parties request that the Court enter this order. A copy of the redlined changes and a "clean copy" accepting the redline changes will be submitted to the Court's proposed order box.

6. Counsel for Defendants have conferred with Plaintiff's counsel, and they have agreed to and signed the proposed Agreed Confidentiality Order and the filing of this Motion for its Entry as Unopposed.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Bryan R. Findley
One of the Attorneys for the Wexford
Defendants

Matthew H. Weller / ARDC No. 6278685
Bryan R. Findley / Indiana Bar no. 34447-30
CASSIDAY SCHADE LLP
222 West Adams Street, Suite 2900
Chicago, IL 60606
(312) 641-3100
(312) 444-1669 – Fax
mweller@cassiday.com
bfindley@cassiday.com

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2024, I electronically filed the foregoing document with the clerk of the court for the Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ Bryan R. Findley